

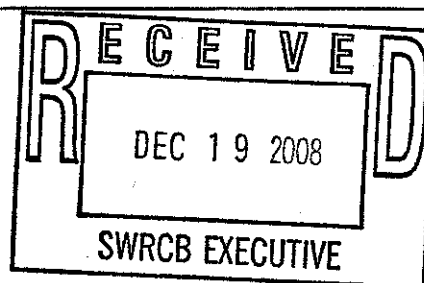


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December 22, 2008

Tam M. Doduc, Chair and Members of  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812



Sent by email to [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

SUBJECT: Comment Letter - **PROPOSED RECYCLED WATER POLICY**

Dear Chair Doduc and Members of the Board:

The Water Replenishment District of Southern California (WRD) appreciates the opportunity to provide comments on the proposed Recycled Water Policy (Policy). Increased use of recycled water is critical to California's water supply future, and the policy should facilitate the beneficial use of recycled water for irrigation and groundwater recharge, among other uses. We are aware that the Association of California Water Agencies, the California Association of Sanitation Agencies and the WaterReuse Association (the Associations) have submitted comments on the proposed Policy, and we endorse the language changes the associations have recommended.

The WRD is responsible for replenishment of the Central and West Coast Basins in the southern area of Los Angeles County. These groundwater basins provide one third or more of the water supply to the area for about 4 million people. Historically, the WRD has utilized recycled water, local runoff, and imported water for replenishment purposes.

We support the overall structure and approach of the November 4, 2008 proposed Policy and believe it is a significant improvement over the previous drafts. The proposed Policy also tracks the September 2, 2008 draft prepared by a group of water industry and nongovernmental organization stakeholders. However, we urge the State Water Board to consider additional revisions to the proposed Policy in order to provide greater clarity, increase the practicality of implementation, and conserve the limited resources of water recyclers, their customers, and the Water Boards.

**Salt and Nutrient Management Plans:**

One of our major concerns with the earlier State Water Board draft of the Policy was the requirement that individual water recycling projects would be required to complete salt management plans. We are pleased that the November 4, 2008 version recognizes that salt and nutrient issues within groundwater basins cannot be resolved by focusing only on recycled water use, and that the proper approach to addressing these

issues is through regional plans, developed and driven by local groups of stakeholders, including the Regional Water Boards.

We are concerned, however, that the Policy does not limit the salt and nutrient planning requirement to those basins where beneficial uses are impaired or threatened, or where high quality waters are in need of protection. While the Policy recognizes that the plans may vary in complexity, the policy requires plans for all basins. Since the development and implementation of the plans is critical in some areas, but not everywhere, it is important for the Policy to limit the development of such plans, to only those basins that need them. Also, these plans should be limited to only salt and nutrients and no other constituents, unless all stakeholders and the Regional Water Boards agree that they should be addressed. By restricting the application of these plans only to areas in need and only to salt and nutrients, limited public resources can be devoted to areas of real concern. Past experience from others has shown that such studies can be complex, exhaustive, time consuming, and costly, and therefore, their judicious application is critical to practical development that will ultimately facilitate implementation. Finally, the organization and structure of this section should be improved to provide a more useful outline of how to proceed with these plans

#### **Specification of Monitoring Frequencies**

Another concern raised during the debate over the previous draft of the Policy was a concern that many of the proposed provisions were far too specific for Board policy. For the most part, the current Policy avoids this flaw and strikes the appropriate note of broad goals and guidance. One exception is in the area of monitoring requirements. In several places, the Policy would mandate a particular minimum monitoring frequency, without regard to the circumstances of the project or the recommendations of the expert scientific panel to be established. We do not believe this is appropriate, and recommend that the monitoring frequencies be deleted from the sections dealing with landscape irrigation (Section 7(b)(4)) and groundwater recharge (Section 8(b)(2).) With regard to chemicals of emerging concern (CECs), both sections should state that monitoring for these constituents may be required in accordance with the expert panel recommendations.

Thank you for the opportunity to provide our comments on the proposed Policy. If you have any questions, please contact me at [hng@wrdd.org](mailto:hng@wrdd.org) or 562 275-4245.

Sincerely,



Hoover Ng, P.E.  
Water Quality Program Manager

**C: Mary Grace Pawson, WateReuse Association  
Roberta Larson, Legal Counsel to WateReuse Association  
David Bolland, Association of California Water Agencies**